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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ex Parte Presentation

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Application by SBC Communications Inc., et al. for Provision of In-Region, InterLATA Services in Illinois, Indiana, Ohio, and Wisconsin,*
WC Docket No. 03-167

Dear Ms. Dortch:

On behalf of SBC Communications Inc. ("SBC"), I am writing to inform you of a few corrections that SBC would like to make to some affidavits that were filed with the Joint Application on July 17, 2003. The appropriate corrections are reflected in an attachment to this letter. See Attachment A.

In addition, representatives of SBC met yesterday with FCC staff to present an overview of SBC's operational support systems in its Midwest region. The following people participated on behalf of SBC: Beth Lawson, Kelly M. Murray, Michelle A. Thomas, Rebecca L. Sparks, Jamie Williams, and Geoffrey M. Klineberg. The following participated on behalf of the FCC: Jeremy Miller, Pam Arluk, Cathy Carpino, Jeff Tignor, and Rodney McDonald. I am attaching to this letter a copy of the materials that SBC distributed at the meeting. See Attachment B.

The materials in Attachment B include some information that is confidential. Accordingly, pursuant to the Commission's rules governing the handling of such information, I am filing one copy of this letter with the confidential material attached. Inquiries regarding access to the confidential material should be addressed to Kevin Walker, Kellogg, Huber, Hansen, Todd & Evans, PLLC, 1615 M Street, N.W., Suite 400, Washington, D.C., 20036, (202) 367-7820.

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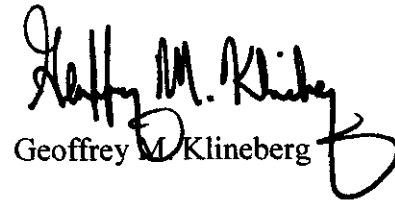
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Marlene H. Dortch
July 25, 2003
Page 2

Ex Parte Presentation

In accordance with this Commission's Public Notice, DA 03-2344 (July 17, 2003), SBC is filing an original and two copies of the redacted version of this letter. Thank you for your kind assistance in this matter.

Sincerely,


Geoffrey M. Klineberg

Attachments

cc: Pam Arluk
Janice Myles
Jon Feipel
Karl Henry
Hisham Choueiki
Nicholas Linden
Layla Seirafi-Najar
Qualex International

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ATTACHMENT A

Affidavit Corrections

I. Justin W. Brown/Mark J. Cottrell/Michael E. Flynn (App. A, Tab 6)

Paragraph 169 of the Joint Affidavit should read as follows:

169. MCI alleges that it has lost customers either through issuing disconnect orders or losses to other carriers, yet was still being billed usage for these lost customers. MCI provided SBC with 487 lines that they claim they had lost previously. [Footnote unchanged] SBC investigated these lines and determined that ~~273 lines had received Line Loss Notifications in error (not 364 in error that MCI alleges).~~ approximately 360 lines had received Line Loss Notifications in error. These notices were sent in error in 2001 and 2002. SBC has agreed to adjust the charges, including usage, associated with these errors due to the fact that MCI had stopped billing these end users. It should be noted that in 2003, SBC has only identified ~~one~~ three Line Loss Notifications sent to MCI in error and quickly resolved ~~this~~ these errors. Moreover, the Usage errors that MCI has raised are attributed to the Line Loss Notification problem in 2001-2002 and are not related to the reconciliation.

II. Mark J. Cottrell/Beth Lawson (App. A, Tab 11)

Footnote 85 (at paragraph 206) of the Joint Affidavit should read as follows:

- ⁸⁵ See Attachment R at 1. In order to comply with all Change Management requirements, all release requirements for the quarterly release scheduled March 13, 2004 must be completed by the end of July 2003, with final business requirements and a prioritized list of enhancements forwarded to SBC's Information Technology ("IT") organization by the middle of August. Systems design work to implement the release will be conducted by IT until the end of September. Based on that work, initial requirements will be distributed to the CLECs no later than ~~October 3, 2003,~~ October 13, 2003, with final requirements due no later than ~~November 14, 2003.~~ November 24, 2003. See CMP § 3.3 and subsections. Internal code development will continue until the end of December, at which time internal testing will begin. The code then will be released for CLEC testing in early February, at least 37 days prior to implementation. See CMP § 3.3.7.

III. Kent A. Currie (App. A, Tab 12)

Paragraph 49 of the Affidavit should read as follows:

49. Ohio Bell developed TELRIC studies for caged, cageless, shared and virtual forms of collocation. Studies for shared and cageless collocation have been the subject of extensive proceedings. On March 13, 2003, the PUCO issued an Order

and Opinion that directed Ohio Bell to file compliance cost studies for shared cage and cageless collocation offerings consistent with its rulings in that Order. [Footnote unchanged] Ohio Bell made the required changes and submitted its compliance studies to the PUCO staff and interested parties on April 14, 2003. On June 10, 2003, the PUCO issued an Entry on Rehearing in Case No. 96-922-TP-UNC that deemed the Ohio Bell compliance studies approved, if no party files objections on or before July 14, 2003. [Footnote unchanged] Since no objections were filed, the permanent rates were automatically approved. The remaining collocation studies have been approved by the PUCO.

A corresponding change should be made to Attachment B to this Affidavit (at page 2):

Shared Cage Physical Collocation¹
Cageless Physical Collocation¹
.....

¹ Pursuant to the PUCO June 10, 2003, Entry on Rehearing in Case No. 96-922-TP-UNC, these studies will be deemed approved, if no party files objections on or before July 14, 2003. Since no objections were filed, the permanent rates were automatically approved.

Section 6.5 of Attachment A to this Affidavit (at page 22) should read as follows:

6.5 Changes ordered by the PUCO to the Unbundled Inter-Office Transport Costs

The PUCO ordered the following changes to ~~the AFAM cost model used to calculate usage costs~~ Ohio Bell's development of unbundled interoffice transport costs:

- Use the usable capacity fill factors set forth in the Ameritech Cost Analysis Resource (ACAR).
- Use the fiber utilization factor associated with the assumption that a 4-strand fiber system is used for feeder loop facilities.

The cost studies submitted and approved in the compliance phase of the TELRIC Case reflected these ordered changes. Usable capacity fill factors as well as using the fiber utilization factor associated with a 4-strand fiber system have been used in other cost studies awaiting PUCO approval.

IV. John S. Habeeb (App. A, Tab 23)

Paragraphs 9 and 10 of the Affidavit should read as follows:

9. Ordering. AADS submits orders for UNEs, Broadband Service, and special access services from Michigan Bell through Michigan Bell's EDI and Network Data Mover ("NDM") interfaces and the SBC Access Ordering tool. AADS processes and transmits Local Service Requests ("LSRs") to Michigan Bell through EDI.
10. Provisioning. AADS provisions Frame Relay and Asynchronous Transfer Mode ("ATM") Cell Relay services to business customers in AADS's service area. AADS's Frame Relay and ATM networks are comprised of multiple packet switches interconnected with transport facilities. When necessary, AADS obtains such transport facilities by ordering special access services from Michigan Bell or other local exchange carriers. AADS uses the NDM interface and the SBC Access Ordering tool to order such access services from Michigan Bell.

V. Daniel R. McKenzie (App. A, Tab 32)

Paragraph 2 of the Affidavit should read as follows:

2. I am familiar with the nature and extent of local competition in Ohio Bell's service territory, the development and status of Ohio Bell's interconnection agreements and wholesale prices, and the PUCO's review of Ohio Bell's application to demonstrate compliance with Track A and the competitive checklist in § 271 of the Telecommunications Act of 1996 ("Act") in PUCO Case No. 00-942-TP-COI. In addition, I was directly involved in the numerous collaborative efforts with Competitive Local Exchange Carriers ("CLECs") and the PUCO Staff resulting from both the SBC/Ameritech merger in PUCO Case No. ~~98-1082-TP-UNC~~ 98-1082-TP-AMT and throughout the § 271 compliance proceeding.

Paragraph 80 of the Affidavit should read as follows:

80. Ohio Bell does have other rate elements that are associated with line sharing (including interim rates for cross-connects, optional ILEC-owned splitter, and OSS modification charge) and xDSL-capable loops generally (including standard xDSL loop conditioning and loop qualification). In its March 13, 2003 Opinion and Order, Case Nos. 96-922 and 00-1368, the PUCO set rates for loop qualification and loop conditioning. The PUCO established an interim rate of 10 cents for a mechanized loop qualification inquiry when the information set forth by the Commission in the UNE Remand Order is available electronically. [Footnote unchanged] If the data is not available electronically, the PUCO set an interim rate of \$22.50, the rate proposed by a group of CLECs. [Footnote unchanged] If a CLEC requests information that exceeds the information

specified by the Commission and manual intervention is required, the PUCO established an interim rate of \$131.08. [Footnote unchanged] For loop conditioning, the PUCO adopted a rate structure that assesses a conditioning charge on all DSL-capable loops ordered. The interim charge was set at \$10.28 for loops up to 17,500 feet in length and \$66.10 for loops that exceed 17,500 feet. The PUCO affirmed its loop conditioning decision in its June 10, 2003 Entry on Rehearing (Case No. 96-922-TP-UNC). Like the loop qualification rates, these interim rates are subject to true-up and are assessed on a per occurrence basis. [Footnote unchanged]

Paragraph 92 of the Affidavit should read as follows:

92. On an interim basis, the PUCO established a nonrecurring charge (\$33.88) for a new UNE-P combination for residential exchange service in its July 11, 2002 Entry in Case Nos. 96-922 and 00-1368. The PUCO did not set a rate for other new combinations at that time. On March 13, 2003, in its Entry on Case No. 00-942-TP-COI, the PUCO approved the interconnection agreement amendment and set forth the interim pricing for all new UNE combinations. [Footnote unchanged] That amendment includes the \$33.88 rate for residential combinations as well as an attachment, *Schedule – UNE Combinations*, that contains ten UNE-P arrangements and four EEL arrangements. CLEC requests for any of these listed combinations are charged the applicable UNE service order charge(s) plus the recurring and nonrecurring charges for the individual UNEs and cross connect ordered. For those UNE combinations not specifically delineated (i.e., the ten UNE-Ps and four EELs), a Bona Fide Request (“BFR”) is required and pricing for such requests is determined on a case-by-case basis.

Paragraph 101 of the Affidavit should read as follows:

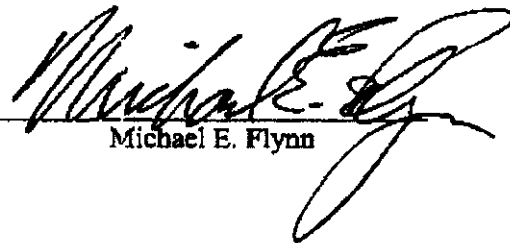
101. Collocation rates were set by the PUCO in Case No. 96-922-TP-UNC. Rates for Physical caged and virtual collocation were approved in June 1999. The PUCO ruled on Ohio Bell’s proposed TELRIC studies for shared cage and cageless collocation on March 13, 2003, also in Case No. 96-922-TP-UNC. Those studies were resubmitted on April 14, 2003. In its June 10, 2003 Entry on Rehearing, the PUCO directed all parties to file any objections to the April 14 compliance studies by July 14, 2003. The PUCO ordered that if no objections are filed by July 14, 2003 the compliance studies will be deemed approved effective July 15, 2003 without further PUCO order. **Since no objections were filed, the permanent rates were automatically approved.** As with all other interim UNE rates, by PUCO rule, once the permanent rates resulting from new studies are effective, all carriers operating under the interim pricing will be automatically converted to the permanent rates and true-ups will be made. (If CLECs request adjacent on-site collocation, a Nonstandard Collocation Request process can be used and prices will be developed on an individual case basis.) The collocation rates established reflect both monthly flat rates for the facilities used, as well as non-recurring charges to recover the costs for the items required or requested to be provided.

Finally, the table on page 6 of Attachment A to the Affidavit should include the following entry at the end:

WIRELESS INTERCONNECTION AGREEMENT	Effective Date	Approval Date
West Virginia PCS Alliance, LC	5/24/02	8/23/02

I hereby declare, under penalty of perjury, that Part I of the foregoing attachment is true and correct.

Executed on July 25, 2003.



Michael E. Flynn

I hereby declare, under penalty of perjury, that Part II of the foregoing attachment is true and correct.

Executed on July 25, 2003.

Beth Lawson
Beth Lawson

I hereby declare, under penalty of perjury, that Part III of the foregoing attachment is true and correct.

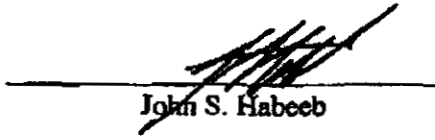
Executed on July 25, 2003.



Kent A. Currie

I hereby declare, under penalty of perjury, that Part IV of the foregoing attachment is true and correct.

Executed on July 25, 2003.



John S. Habeeb

I hereby declare, under penalty of perjury, that Part V of the foregoing attachment is true and correct.

Executed on July 25, 2003.


Daniel R. McKenzie

ATTACHMENT B

(REDACTED – FOR PUBLIC INSPECTION)

Midwest Operations Support Systems

**Presented by:
Beth Lawson**



OSS Overview

- **Pre-Ordering**
- **Ordering/Provisioning**
- **Maintenance and Repair**
- **Billing**
- **CLEC Training**
- **CLEC Support**
- **Change Management Process**

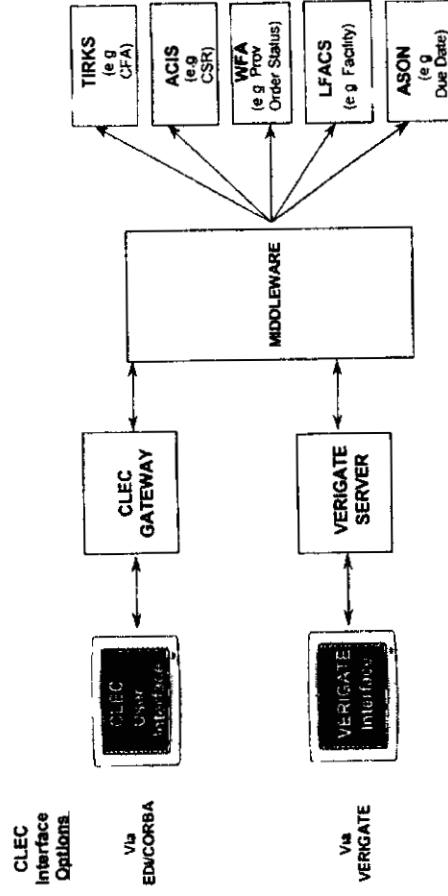


Pre-Ordering

- **Enhanced Verigate (Web-Toolbar)**
- **EDI/CORBA**



CLEC Pre-Ordering Options



Enhanced Verigate

- **13-State GUI (Web-Toolbar Platform)**
 - **No development required for CLECs**
- **Commercial volumes**
 - **May 2003 – More than 690,000 Transactions**
 - **Cumulative (from 6/02) = More than 6.8 Million Transactions**



These volumes represent the SBC Midwest regional interface volumes which include CLEC transactions in MI, IL, IN, OH and WI.

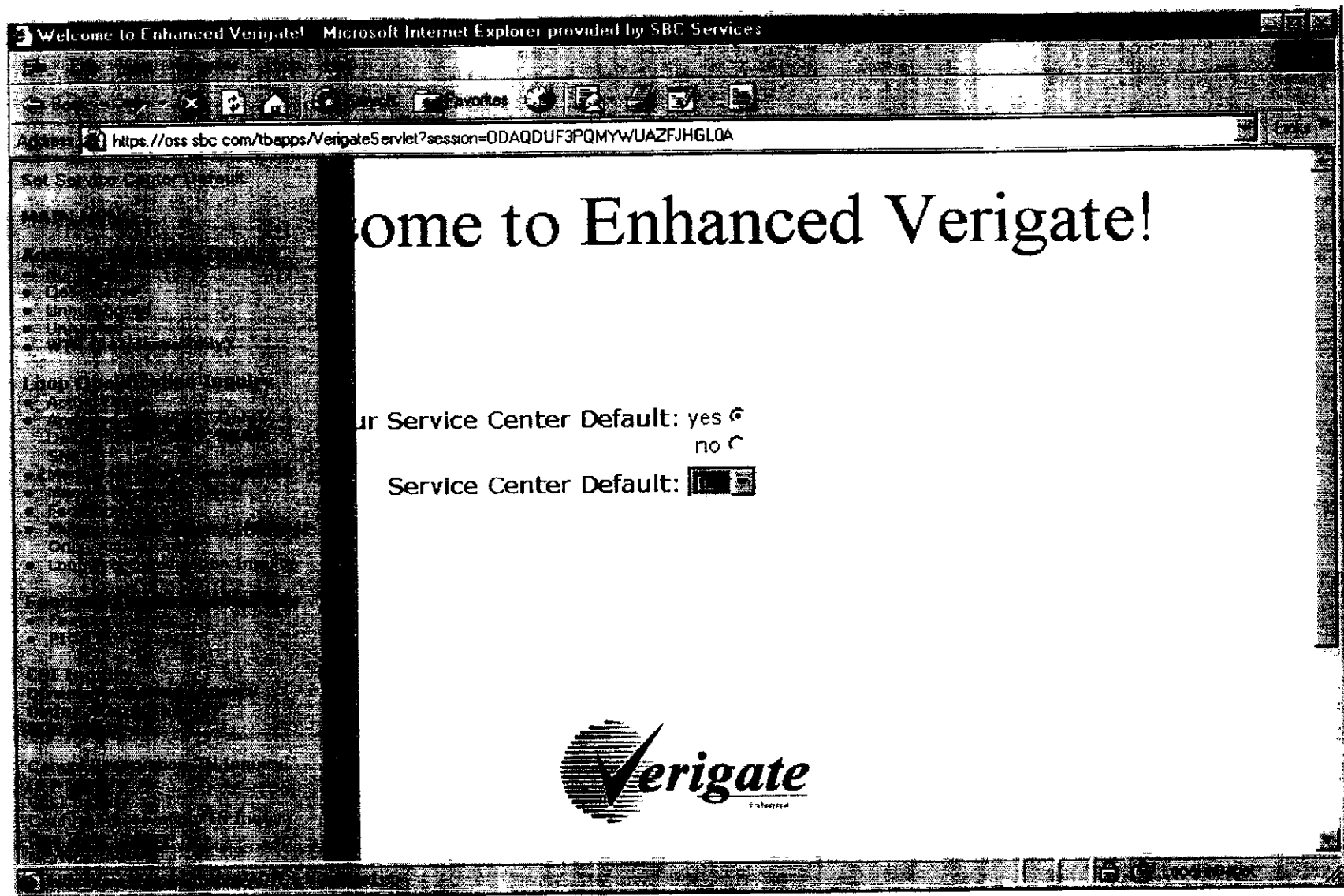
July 24, 2003

EDI/CORBA

- **13-State “Gateway” industry standard app-to-app interfaces**
- **Can be integrated with CLECs’ systems & with EDI for ordering**
- **Support two structural protocols**
- **Commercial volumes**
 - **May 2003 – More than 2.8 Million Transactions**
 - **Cumulative (from 6/02) – More than 24.5 Million Transactions**

These volumes represent the SBC Midwest regional interface volumes which include CLEC transactions in MI, IL, IN, OH & WI.





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